

**NOTICE OF 30-DAY PERIOD  
FOR PUBLIC COMMENT**

Preliminary Findings Regarding a Federal Enforceable State Operating Permit Renewal

for Createc Corporation  
in Jay County

**FESOP No.: F075-14966-00024**

Notice is hereby given that the above-mentioned company, located at 1619 North Meridian, Portland, Indiana 47371, has made a renewal application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP) for stationary foam packaging material manufacturing plant.

This proposed FESOP renewal does not contain any new proposed emission units, and no conditions from previously issued permits/approvals have been corrected or removed. This notice fulfills the public notice procedures to which those conditions are subject.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to any air quality issues, interpretation of the state and federal rules, calculations made, technical issues, or the effect that the operation of this source would have on any aggrieved individuals. IDEM, OAQ does not have jurisdiction in specifying and implementing requirements for zoning, odor or noise. For such issues, please contact your local officials.

A copy of the application and draft permit is available for examination at the Jay County Public Library, 315 North Ship, Portland, Indiana 47371. A copy of the draft permit is also available for examination at: [www.IN.gov/idem/air/permits/](http://www.IN.gov/idem/air/permits/). All statements, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If adverse comments concerning the air pollution impact of this draft source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the OAQ, at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have fifteen (15) days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Adeel Yousuf, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext.3252 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

AY/EVP



Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.state.in.us/idem](http://www.state.in.us/idem)

## **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY**

**Createc Corporation  
1619 North Meridian  
Portland, Indiana 47371**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F075-14966-00024	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 20, 2002  Expiration Date: December 20, 2007

## **SECTION A SOURCE SUMMARY**

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

## **SECTION B GENERAL CONDITIONS**

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.19 Operational Flexibility [326 IAC 2-8-15]
- B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [I13-14-2-2]
- B.22 Transfer of Ownership or Operation [326 IAC 2-8-10]
- B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

## **SECTION C SOURCE OPERATION CONDITIONS**

### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

- C.1 Particulate Emission Limitations For Manufacturing Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(e)]
- C.2 Overall Source Limit [326 IAC 2-8]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.8 Stack Height [326 IAC 1-7]
- C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

### **Testing Requirements [326 IAC 2-8-4(3)]**

- C.10 Performance Testing [326 IAC 3-6]

### **Compliance Requirements [326 IAC 2-1.1-11]**

- C.11 Compliance Requirements [326 IAC 2-1.1-11]

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

- C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.13 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]**

- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.15 Compliance Response Plan -Preparation, Implementation, Records, and Reports

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

**SECTION D.1 FACILITY OPERATION CONDITIONS**

**Two natural gas/No. 2 oil fired boilers**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.1.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

D.1.4 Sulfur Dioxide Emissions and Sulfur Content

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

D.1.5 Visible Emissions Notations

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.1.6 Record Keeping Requirements

D.1.7 Reporting Requirements

**SECTION D.2 FACILITY OPERATION CONDITIONS**

**Manufacturing line (20 molding machines and 4 pre-expanders)**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.2.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)  
[326 IAC 2-8-4(1)]

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.2.3 Record Keeping Requirements

D.2.4 Reporting Requirements

**SECTION D.3 FACILITY OPERATION CONDITIONS**

**Insignificant Activity**

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

**Certification Form**

**Emergency Occurrence Form**

**Natural Gas Fired Boiler Certification**

**Quarterly Report Form**

**Quarterly Deviation and Compliance Monitoring Report Form**

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

---

The Permittee owns and operates a stationary polystyrene foam packaging material manufacturing plant.

Authorized Individual:	Rodger Cooper, General Manager
Source Address:	1619 North Meridian, Portland, Indiana 47371
Mailing Address:	1619 North Meridian, Portland, Indiana 47371
General Source phone:	(219) 726-9333
SIC Code:	3086
Source Location Status:	Jay County
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

---

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas fired boiler with #2 fuel oil as backup, identified as B1, rated at 11.0 million British thermal units per hour (MMBtu/hr), constructed in 1979 and exhausting thorough one stack B1.
- (b) One (1) natural gas fired boiler with #2 fuel oil as backup, identified as B2, rated at 11.9 MMBtu/hr, constructed in 1981 and exhausting through one stack B2.
- (c) One (1) manufacturing line consisting of the following:
  - (1) Twenty (20) molding machines with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.
  - (2) Four (4) pre-expanders, with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

---

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Twenty-one (21) natural gas fired comfort heaters, each with a heat input capacity of 0.15 MMBtu/hr.
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.

- (e) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20C (68F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (g) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (h) Heat exchanger cleaning and repair.
- (i) Process vessel degreasing and cleaning to prepare for internal repairs.
- (j) Paved and unpaved roads and parking lots.
- (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (l) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (m) A laboratory as defined in 326 IAC 2-7(20)(c).
- (n) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 But/hour.
- (o) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (p) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (q) Closed loop heating and cooling systems.
- (r) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (s) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (t) Conveyors as follows: enclosed systems for conveying plastics raw materials and plastic finished goods.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

- (v) Other categories with emissions below insignificant thresholds:
  - (1) Polystyrene scrap grinding controlled by a filter bag vacuum system venting to the interior of the building with emissions less than 5 lbs/hr or 25 lb/day.
  - (2) Application of hot-melt adhesive.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).



- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

---

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

---

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

---

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, . IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ , may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ , by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**

[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

---

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]**

---

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

---

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]**

---

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
---------------

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-2 (PSD);
  - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

---

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

---

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

---

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

---

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Stack Height [326 IAC 1-7]

---

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

---

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.10 Performance Testing [326 IAC 3-6]**

---

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Requirements [326 IAC 2-1.1-11]**

### **C.11 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

### **C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

## **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]**

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

---

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

---

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.19 Compliance with 40 CFR 82 and 326 IAC 22-1**

---

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) natural gas fired boiler with #2 fuel oil as backup, identified as B1, rated at 11.0 million British thermal units per hour (MMBtu/hr), constructed in 1979 and exhausting thorough one stack B1.
- (b) One (1) natural gas fired boiler with #2 fuel oil as backup, identified as B2, rated at 11.9 MMBtu/hr, constructed in 1981 and exhausting through one stack B2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Particulate [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (e) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from Boilers B1 and B2, which were constructed after June 8, 1972, shall be limited to 0.6 pounds of particulate matter per million British thermal units heat input.

#### D.1.2 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from the boilers B1 and B2, each rated at 11.0 and 11.90 MMBtu/hr, respectively, shall not exceed five tenths (0.5) pounds per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

### Compliance Determination Requirements

#### D.1.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:
  - (1) Providing supplier analysis of fuel delivered, if accompanied by a supplier certification; or
  - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
    - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
    - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boilers S-1 and S-2, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.



A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.1.5 Visible Emissions Notations**

---

- (a) Visible emission notations of the boilers B1 and B2 stack exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.1.6 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
  - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

  - (4) Fuel supplier certifications.
  - (5) The name of the fuel supplier; and
  - (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the boiler B1 and boiler B2 stack exhaust while combusting fuel oil.

- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.7 Reporting Requirements

The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) manufacturing line consisting of the following:
- (1) Twenty (20) molding machines with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.
  - (2) Four (4) pre-expanders, with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)]

- (a) The total volatile organic compounds (VOC) delivered to the manufacturing line including twenty (20) molding machines and four (4) pre-expanders shall be limited such that the VOC emissions shall not exceed 97.60 tons per twelve (12) consecutive month period with compliance determined at the end of each month (based on VOC (pentane) emission rate of 85.0 %; 15.0 % of the VOC (pentane) is retained in the final product).

Compliance with the requirements of condition D.1.1(a) shall limit the sourcewide (including insignificant activities) potential to emit of VOC to less than 100 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 2-7 (Part 70) shall not apply.

- (b) The total hazardous air pollutants (HAP) delivered to the manufacturing line including twenty (20) molding machines and four (4) pre-expanders shall be limited such that the source wide single HAP and total HAPs emissions including insignificant activities shall not exceed 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Compliance with these limitations shall make the requirements of 326 IAC 2-7 (Part 70) not applicable to the source.

#### D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

### Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these emission units.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

**Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.2.3 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAPs usage limits and/or the VOC and HAPs emission limits established in Condition D.2.1.
- (1) VOC and HAP content of expandable polystyrene molding compound used.
  - (2) The amount of the VOC and HAP used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (3) The total VOC and HAP usage for each month; and
  - (4) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.2.4 Reporting Requirements**

---

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: (Insignificant Activity)

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Createc Corporation  
Source Address: 1619 North Meridian, Portland, Indiana 47371  
Mailing Address: 1619 North Meridian, Portland, Indiana 47371  
FESOP No.: 075-14966-00024

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Createc Corporation  
Source Address: 1619 North Meridian, Portland, Indiana 47371  
Mailing Address: 1619 North Meridian, Portland, Indiana 47371  
FESOP No.: 075-14966-00024

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)  
    CThe Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
    CThe Permittee must submit notice in writing or by facsimile within two **(2)** working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Createc Corporation  
Source Address: 1619 North Meridian, Portland, Indiana 47371  
Mailing Address: 1619 North Meridian, Portland, Indiana 47371  
FESOP No.: 075-14966-00024

9	Natural Gas Only
9	Alternate Fuel burned
From: _____	To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Createc Corporation  
Source Address: 1619 North Meridian, Portland, Indiana 47371  
Mailing Address: 1619 North Meridian, Portland, Indiana 47371  
FESOP No.: 075-14966-00024  
Facility: Manufacturing line (20 molding machines and 4 pre-expanders)  
Parameter: VOC emissions  
Limit: Total VOC emissions from the manufacturing line shall be limited to 97.6 tons per year with compliance determined at the end of each month (based on VOC (pentane) emission rate of 85.0 %; 15.0 % of the VOC (pentane) is retained in the final product).

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Emissions This Month	VOC Emissions Previous 11 Months	VOC Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Createc Corporation  
Source Address: 1619 North Meridian, Portland, Indiana 47371  
Mailing Address: 1619 North Meridian, Portland, Indiana 47371  
FESOP No.: 075-14966-00024  
Facility: Manufacturing line (20 molding machines and 4 pre-expanders)  
Parameter: single HAP and total HAPs  
Limit: Single HAP and total HAPs emissions from the manufacturing line shall be limited to less than 10 and 25 tons per year with compliance determined at the end of each month, respectively.

YEAR: \_\_\_\_\_

Month	Column 1		Column 2		Column 1 + Column 2	
	Single HAP Emission This Month (tons)	Total HAP Emission This Month (tons)	Single HAP Emission Previous 11 Months (tons)	Single HAP Emission Previous 11 Months (tons)	Single HAP Emission 12 Month Total (tons)	Total HAP Emission 12 Month Total (tons)
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Createc Corporation  
Source Address: 1619 North Meridian, Portland, Indiana 47371  
Mailing Address: 1619 North Meridian, Portland, Indiana 47371  
FESOP No.: 075-14966-00024

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal**

#### **Source Background and Description**

**Source Name:** Createc Corporation  
**Source Location:** 1619 North Meridian, Portland, Indiana 47371  
**County:** Jay  
**SIC Code:** 3086  
**Operation Permit No.:** F075-14966-00024  
**Permit Reviewer:** Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Createc Corporation relating to the operation of a stationary foam packaging material manufacturing plant. Createc Corporation was issued FESOP 075-7992-00024 on June 27, 1997.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) natural gas fired boiler with #2 fuel oil as backup, identified as B1, rated at 11.0 million British thermal units per hour (MMBtu/hr), constructed in 1979 and exhausting thorough one stack B1.
- (b) One (1) natural gas fired boiler with #2 fuel oil as backup, identified as B2, rated at 11.9 MMBtu/hr, constructed in 1981 and exhausting through one stack B2.
- (c) One (1) manufacturing line consisting of the following:
  - (1) Twenty (20) molding machines with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.
  - (2) Four (4) pre-expanders, with a combined capacity of 1,210 pounds per hour of expanded polystyrene beads, and exhausting to stacks F-1 through F-5.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **New Emission Units and Pollution Control Equipment**

There are no new emission units at this source during the review process.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Twenty-one (21) natural gas fired comfort heaters, each with a heat input capacity of 0.15 MMBtu/hr.
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (d) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (e) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100F) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20C (68F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (g) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.
- (h) Heat exchanger cleaning and repair.
- (i) Process vessel degreasing and cleaning to prepare for internal repairs.
- (j) Paved and unpaved roads and parking lots.
- (k) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (l) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).
- (m) A laboratory as defined in 326 IAC 2-7(20)(c).
- (n) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 But/hour.
- (o) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (p) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (q) Closed loop heating and cooling systems.

- (r) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (s) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (t) Conveyors as follows: enclosed systems for conveying plastics raw materials and plastic finished goods.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (v) Other categories with emissions below insignificant thresholds (VOC less than three (3) pounds per hour:
  - (1) Polystyrene scrap grinding controlled by a filter bag vacuum system venting to the interior of the building with emissions less than 5 lbs/hr or 25 lb/day.
  - (2) Application of hot-melt adhesive.

### Existing Approvals

The source has been operating under the following previous approvals:

- (a) FESOP 075-7992-00024, issued on June 27, 1997.
- (a) First Administrative Amendment 075-9051-00024, issued on February 10, 1998.
- (b) Second Administrative Amendment 075-14862-00024, issued on November 13, 2001.
- (c) Third Administrative Amendment 075-15327-00024, issued on January 10, 2002.
- (d) Fourth Administrative Amendment 075-16163-00024, issued on July 16, 2002

All terms and conditions of previous permit issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on September 24, 2001. Additional information was received on September 13, 2002.



There was no notice of completeness letter mailed to the source.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (twelve (12) pages).

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	1.49
PM-10	1.56
SO <sub>2</sub>	50.87
VOC	528.71
CO	11.35
NO <sub>x</sub>	15.75

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Ethyl Benzene	greater than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

## Potential to Emit After Issuance

The source, issued a FESOP on June 27, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F075-7992-00024; issued on June 27, 1997).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Manufacturing Line (20 molding machines and 4 pre-expanders)	--	--	--	97.60	--	--	9.80 (single)
Boilers 1 and 2	1.43	1.43	50.86	0.55	8.43	14.33	0.18
Insignificant Activities	0.06	0.13	0.01	1.09	2.92	1.42	negl.
Total PTE After Issuance	1.49	1.56	50.87	99.24	11.35	15.75	< 10 (single) < 25 (total)

## County Attainment Status

The source is located in Jay County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jay County has been designated as attainment or unclassifiable for ozone.

### **Federal Rule Applicability**

There are no new federal rules applicable to the source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for the original FESOP F075-7992-00024, issued on June 27, 1997.

- (a) Two (2) boilers (B1 and B2) each constructed in 1979 and 1981 and rated at 11.0 and 11.9 MMBtu per hour, respectively, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because both were constructed prior to the rule applicability date of June 9, 1989.
- (b) There are no other New Source Performance Standards (326 IAC 12) applicable to this source.
- (c) The parts degreasing operation that includes Safety-Kleen part washing solvent with capacity less than 145 gallons, as an insignificant activity, is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20, (40 CFR 63, Subpart T). Subpart T applies to degreasing operations using one of six listed halogenated solvents, or any combination of the solvents in a concentration greater than 5 percent by weight, as a cleaning or drying agent. The source uses Safety-Kleen 105 part washing solvent which contains halogenated solvents in a concentration less than 5 percent by weight (maximum of 1%); therefore, Subpart T does not apply.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### **State Rule Applicability - Entire Source**

There are no new state rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP F075-7992-00024, issued on June 27, 1997.

#### **326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD)**

The existing source was constructed prior to the August 7, 1977 rule applicability date. This source is not considered a major source because it is not one of the 28 listed source categories and it has the potential to emit after controls of less than 250 tons per year of any criteria pollutant. As a FESOP source, the total VOC emissions shall be limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration, PSD) shall not apply.

#### **326 IAC 2-6 (Emission Reporting)**

This source is located in Jay County which is not one of the specifically listed counties, nor does the source have the potential to emit CO, VOC, NO<sub>x</sub>, PM<sub>10</sub> (including fugitive emissions), or SO<sub>2</sub> in amounts at or exceeding 100 tons per year. The potential to emit of all other regulated pollutants is less than 100 tons per year. Therefore, 326 IAC 2-6 does not apply.

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 2-8-4 (FESOP)**

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply:

- (a) The total volatile organic compounds (VOC) delivered to the manufacturing line including twenty (20) molding machines and four (4) pre-expanders shall be limited such that the VOC emissions from the manufacturing line shall not exceed 97.60 tons per twelve (12) consecutive month period with compliance determined at the end of each month (based on VOC (pentane) emission rate of 85.0 %; 15.0 % of the VOC (pentane) is retained in the final product).

*Note: The percent of VOC (pentane) emitted from the process is taken from the 1990 EPA Emission Standards Division document, EPA-450/3-90-020 (Control of VOC Emissions from Polystyrene Foam Manufacturing). According to this document, total of 85% VOC (pentane) is emitted through the entire process and 15 % of VOC (pentane) is retained in the final product which is shipped.*

- (b) The total hazardous air pollutants (HAP) delivered to the manufacturing line including twenty (20) molding machines and four (4) pre-expanders shall be limited such that the source wide single HAP and total HAPs emissions shall not exceed 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively.

Compliance with above conditions will limit the source-wide VOC, single HAP, and total HAPs emissions including insignificant activities to less than 100, 10 and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

**State Rule Applicability - Individual Facilities**

There are no new state rules determined as applicable to individual facilities at this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for the original FESOP F075-7992-00024, issued June 27, 1997:

**326 IAC 2-4.1-1 (New Source Toxics Control)**

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because no new or reconstructed facilities with a PTE of any single HAP at 10 tons per year or 25 tons per year of the combination HAPs have been installed since July 27, 1997. Therefore, 326 IAC 2-4.1-1 does not apply.

326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) boilers (ID Nos. B1 and B2) firing natural gas or No. 2 distillate fuel oil, each constructed in 1979 and 1981 and rated at 11.0 and 11.9 MMBtu/hr, respectively, are subject to 326 IAC 6-2-3. Pursuant to this rule, particulate emissions from indirect heating facilities constructed prior to September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

C = 50 u/m<sup>3</sup>

Pt = emission rate limit (lbs/MMBtu)

Q = total source heat input capacity (MMBtu/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height in feet. If a number of stacks of different heights exist, average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times P_{a_i} \times Q_i}{\sum_{i=1}^N P_{a_i} \times Q_i}$$

where: Pa = the actual controlled emissions rate in lb/MMBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

For boiler B1, constructed in 1979, respectively (Q = 11.0 MMBtu/hr):

$$Pt = (50 \times 0.67 \times 22) / (76.5 \times 11.0^{0.75} \times 1^{0.25}) = 1.59 \text{ lbs PM/MMBtu}$$

For boiler B2, constructed in 1981, respectively (Q = 11.0 + 11.9 = 22.90 MMBtu/hr):

$$Pt = (50 \times 0.67 \times 22) / (76.5 \times 22.90^{0.75} \times 2^{0.25}) = 0.77 \text{ lbs PM/MMBtu}$$

However, pursuant to 326 IAC 6-2-3(e), Pt for indirect heating facilities constructed after June 8, 1972 shall not exceed 0.6 lbs PM/MMBtu, therefore PM emissions combined from both boilers are limited to 0.6 lbs PM/MMBtu.

compliance calculation:

Potential PM emissions = 1.43 tons per year (See Appendix A, page 1)

$$1.43 \text{ TPY} \times 2000 \text{ lb/ton} \times 1/22.90 \text{ (hr/MMBtu)} \times 1/8760 \text{ (yr/hours)} = 0.014 \text{ lb PM/MMBtu}$$

Potential PM emissions for boilers B1 and B2 (0.014 lbs PM/MMBtu) are less than the allowable 0.6 lbs PM/mmBtu, therefore the boilers B1 and B2 will comply with the requirements of 326 IAC 6-2-3.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The two (2) natural gas-fired boilers (B-1 and B-2) using No. 2 fuel oil as back-up fuel are subject to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations). Pursuant to 326 IAC 7-1.1-2, sulfur dioxide emissions from the two (2) boilers using No. 2 fuel oil shall be limited to 0.5 pounds per million BTU heat input when using No. 2 fuel oil. This equates to a fuel oil sulfur content limit of 0.5%. The facility will comply with this rule by limiting distillate oil sulfur content to 0.5% or less.

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

Pursuant to this rule, the source shall submit reports of calendar month average sulfur content, heat content, fuel consumption, and sulfur dioxide emission rate (pounds SO<sub>2</sub> per MMBtu), to the OAQ upon request.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8. The manufacturing line including molding machines and pre-expanders at Createc Corp. were constructed in 1976. Therefore, rule 326 IAC 8-1-6 does not apply to the manufacturing line of Createc Corp.

326 IAC 8-3-2 (Cold Cleaner Operations)

The source, which is located in Jay County and maintains Safety-Kleen type cold cleaning parts washer with capacities of less than 145 gallons (i.e., insignificant activities), is subject to the applicable rule requirements since the facilities are new after January 1, 1980. As such, and pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall ensure that the following requirements are met for the degreasing operation:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The requirements of this rule apply to cold cleaning degreasers without remote solvent reservoir that either existed as of July 1, 1990 and was located in a specified county, or the cleaning facility was constructed after July 1, 1990 and was located in anywhere in the state. This source, located in Jay County which is a non-listed county, is not subject to the applicable rule requirements since the degreaser (installed in 2002) has remote solvent reservoir.

**326 IAC 8-6 (Organic Solvent Emission Limitations)**

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is located in Jay County and, as a FESOP source, shall limit total VOC to less than 100 tons per year. Therefore, this rule does not apply to this source.

**326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)**

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. The source is located in Jay County. Therefore, this rule is not applicable to this source.

There are no other 326 IAC 8 rules that apply.

**Testing Requirements**

Compliance testing is not required of this source since the material usage and related VOC and volatile organic HAP emissions assume an emission factor of 2,000 pounds of pollutant emitted per ton of pollutant input to the manufacturing operation.

**Compliance Requirements**

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. The two (2) boilers (ID Nos. B1 and B2) have applicable compliance monitoring conditions when burning No. 2 fuel oil as specified below:

- (a) Visible emission notations of the boilers B1 and B2 stack exhaust shall be performed once per shift during normal daylight operations while combusting fuel oil. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the two (2) boilers (Boiler B1 and Boiler B2) must operate properly to ensure compliance with 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating) and 326 IAC 2-8 (FESOP).

## **Conclusion**

The operation of this foam packaging material manufacturing plant shall be subject to the conditions of the attached proposed FESOP No.: F075-14966-00024.



## Appendix A: Emission Calculations

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 075-14966-00024  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

### Uncontrolled Potential Emissions (tons/year)

Emissions Generating Activity					
Pollutant	Pre-expansion and Molding Line	Natural Gas Combustion (Boiler 1 + Boiler 2)	#2 Fuel Oil Combustion (Boiler 1 + Boiler 2)	Insignificant Activities	TOTAL *
PM	0.00	0.19	1.43	0.06	1.49
PM10	0.00	0.77	1.43	0.13	1.56
SO2	0.00	0.06	50.86	0.01	50.87
NOx	0.00	10.03	14.33	1.42	15.75
VOC	527.07	0.55	0.25	1.09	528.71
CO	0.00	8.43	3.58	2.92	11.35
total HAPs	22.52	0.18	0.00	negl.	22.70
worst case single HAP	(Ethyl Benzene) 22.52	(Hexane) 0.18	0.00	negl.	(Ethyl Benzene) 22.52

Total emissions based on rated capacity at 8,760 hours/year.

\* Boilers 1 and 2 use natural gas as the primary fuel and # 2 fuel oil as back up fuel. The total represents the worst case emissions for each pollutant.

Insignificant emissions consist of gasoline combustion engines, natural gas fired comfort heaters, degreaser, hot melt adhesive and scrap grinder.

### Controlled Potential Emissions (tons/year)

Emissions Generating Activity					
Pollutant	Pre-expansion and Molding Line	Natural Gas Combustion (Boiler 1 + Boiler 2)	#2 Fuel Oil Combustion (Boiler 1 + Boiler 2)	Natural Gas Combustion	TOTAL *
PM	0.00	0.19	1.43	0.06	1.49
PM10	0.00	0.77	1.43	0.13	1.56
SO2	0.00	0.06	50.86	0.01	50.87
NOx	0.00	10.03	14.33	1.42	15.75
VOC	97.60	0.55	0.25	1.09	99.24
CO	0.00	8.43	3.58	2.92	11.35
total HAPs	9.80	0.18	0.00	negl.	9.98
worst case single HAP	(Ethyl Benzene) 9.80	(Hexane) 0.18	0.00	negl.	(Ethyl Benzene) 9.80

Total emissions based on rated capacity at 8,760 hours/year.

\* Boilers 1 and 2 use natural gas as the primary fuel and # 2 fuel oil as back up fuel. The total represents the worst case emissions for each pollutant.

Insignificant emissions consist of gasoline combustion engines, natural gas fired comfort heaters, degreaser, hot melt adhesive and scrap grinder.

**Appendix A: Emission Calculations**

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 075-14966-00024  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

**Emissions from twenty (20) molding machines and three (3) pre-expanders with combined max. processing capacity of 1,210 pounds per hour**

material: ARCEL Moldable Foam Resin with VOC content of 11.2% and HAP content of 0.5% (Ethyl benzene)  
 maximum throughput: 1210.0 pounds per hour

**VOC (Pentane)**

$$11.20\% * 1,210.00 = 135.52 \text{ pounds of VOC per hour}$$

pre-expansion & pre-puff storage	42.00%
molding & finished product storage	43.00%
Total	85.00% of VOC released

**Potential Uncontrolled VOC Emissions**

$$\begin{array}{l} \text{(lb/hr)} \\ 115.19 * \frac{8760}{2000} = 504.54 \text{ tons per year of VOC released from the process} \end{array}$$

**HAP/VOC (Ethyl benzene)**

$$0.50\% * 1,210.00 = 6.05 \text{ pounds of HAP per hour}$$

pre-expansion & pre-puff storage	42.00%
molding & finished product storage	43.00%
Total	85.00% of HAP/VOC released

**Potential Uncontrolled HAP/VOC Emissions**

$$\begin{array}{l} \text{(lb/hr)} \\ 5.14 * \frac{8760}{2000} = 22.52 \text{ tons per year of HAP released from the process} \end{array}$$

**Total Potential Uncontrolled VOC Emissions** = **527.07** tons per year of VOC released from the process

**Limited (controlled) HAP Emissions**

$$\begin{array}{l} \text{(lb/hr)} \\ 22.28 * \frac{8760}{2000} = 97.59 \text{ tons per year of VOC released from the process} \end{array}$$

**Limited (controlled) VOC Emissions**

$$\begin{array}{l} \text{(lb/hr)} \\ 2.24 * \frac{8760}{2000} = 9.80 \text{ tons per year of HAP released from the process} \end{array}$$

**Notes:**

VOC content of 11.2% and HAP content of 0.05% represents a worst case material used and is based on the MSDS sheets, provided by the material manufacturer.

The percent of VOC (pentane) emitted from the process is taken from the 1990 EPA Emission Standards Division document, EPA-450/3-90-020 (Control of VOC Emissions from Polystyrene Foam Manufacturing).

According to this document, a total of 85% VOC (pentane) is emitted through the entire process and 15% of pentane is retained in the final product that is shipped.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 075-14966-00024  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

11.0

96.4

**One boiler (B1) rated at 11.0 MMBtu/hr.**

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.09	0.37	0.03	4.82	0.26	4.05

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

Page 4 of 12 TSD App A

**MM BTU/HR <100**

**HAPs Emissions**

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 091-14438  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.012E-04	5.782E-05	3.614E-03	8.672E-02	1.638E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.409E-05	5.300E-05	6.745E-05	1.831E-05	1.012E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 075-14966-00024  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

11.9

104.2

**One boiler (B2) rated at 11.9 MMBtu/hr.**

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
	**see below					
Potential Emission in tons/yr	0.10	0.40	0.03	5.21	0.29	4.38

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**HAPs Emissions**

Page 6 of 12 TSD App A

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 091-14438  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.095E-04	6.255E-05	3.909E-03	9.382E-02	1.772E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	2.606E-05	5.733E-05	7.297E-05	1.981E-05	1.095E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#2 Fuel Oil**

Page 7 of 12 TSD App A

**Company Name:** Createc Corporation  
**Address City IN Zip:** U.S. 27 North, Portland, Indiana 47371  
**FESOP Renewal:** 1619 North Meridian, Portland, IN 47371  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.5
11	688.29	

**One boiler (B1) rated at 11.0 MMBtu/hr.**

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.69	24.43	6.88	0.12	1.72

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

**Appendix A: Emissions Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)**  
**#2 Fuel Oil**

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 075-14966-00024  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year	S = Weight % Sulfur 0.5
11.9	744.6	

**One boiler (B2) rated at 11.9 MMBtu/hr.**

Emission Factor in lb/kgal	Pollutant				
	PM*	SO2	NOx	VOC	CO
	2.0	71 (142.0S)	20.0	0.34	5.0
Potential Emission in tons/yr	0.74	26.43	7.45	0.13	1.86

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).



**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 075-14966-00024  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

3.15

27.6

**Twenty one (21) comfort heaters, with a heat capacity of 0.15 MMBtu/hr each.**

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	0.03	0.10	0.01	**see below	0.08	1.16

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**  
**HAPs Emissions**

Page 10 of 12 TSD App A

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 075-14966-00024  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.897E-05	1.656E-05	1.035E-03	2.483E-02	4.691E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	6.899E-06	1.518E-05	1.932E-05	5.243E-06	2.897E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations**  
**Internal Combustion Engines - Gasoline Fuel**  
**Turbine (>250 and <600 HP)**  
**Reciprocating**

Page 11 of 12 TSD App A

**Company Name:** Createc Corporation  
**Address City IN Zip:** 1619 North Meridian, Portland, IN 47371  
**FESOP Renewal:** 075-14966-00024  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** September 11, 2002

**Emissions calculated based on output rating (hp)**

Heat Input Capacity                      Potential Throughput  
Horsepower (hp)                              hp-hr/yr

16.0    8000.0

Two (2) walk-behind gasoline fired vaccums each rated at 5.5 hp each; One (1) gasoline fired snow blower rated at 5.0 hp.

Emission Factor in lb/hp-hr	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.21E-04	7.21E-04	5.91E-04	0.0110	0.0216	0.4390
Potential Emission in tons/yr	0.00	0.00	0.00	0.04	0.09	1.76

**Methodology**

Potential Througput (hp-hr/yr) = hp \* 500 hr/yr

It is assumed that the gasoline combustion engines are used 500 hours annually during emergencies.

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-1

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* 8760 hr/yr / (2,000 lb/ton )

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton )

\*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Process	% of bead product used as Scrap	Emission Factor (lb/ton)	Max. Process Wight Rate (lb/hr)	Control Efficiency (%)	Potential PM Emissions (lb/hr)	Potential PM Emissions (ton/yr)	Controlled PM Emissions (ton/yr)
Scrap Grinding	3.00%	0.35	1210.00	99.50%	0.006	0.028	0.00
Note: Assume PM = PM10							
Emission factor of 0.35 is from the similar operation of wood sawing listed in Fire Version 6.23 (SCC# 3-07-008-02)							
<b>Methodology:</b> Potential PM Emissions (ton/hr) = Max. Process Rate (lb/hr) x (1 ton/ 2000 lb) x (% Scrap) x Emission Factor (lb/ton) * 4.38 (ton/vr / lb/hr)							